

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
FIRST-CLASS PACKAGE SERVICE CONTRACT 36
(MC2014-32)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2014-57

**MOTION OF THE UNITED STATES POSTAL SERVICE
FOR TEMPORARY RELIEF**
(September 1, 2017)

The United States Postal Service hereby moves for temporary relief to allow the existing contract in this docket to remain in effect for fifteen (15) additional days, until September 26, 2017. The customer whose competitive product rates were established in this docket wishes to renew its commitment to sending large volumes of First-Class Package Service for the next year at negotiated rates. By the terms of the contract filed in this docket, and pursuant to Order No. 4001 (July 13, 2017), the current rates will expire on September 11, 2017.

The Postal Service and the customer have finalized the successor contract and the Postal Service expects to receive the signed contract back from the customer later today. The parties had some unexpected difficulty reaching final agreement on some provisions in the contract. Additional legal review by both parties was required during the month of August. Despite the parties' best efforts to complete negotiations earlier in August, final agreement was only reached last week. Nevertheless, the Postal Service expects to receive the signed successor contract later today and file it with the Commission next week. Unfortunately, that timeline will not provide the Commission

with adequate time to review and approve the successor contract before the September 11 expiration of the existing contract in this docket.

Therefore, the Postal Service respectfully requests that the Commission grant an additional fifteen (15) day extension to allow the existing contract to remain in effect until September 26, 2017, or until such time as the successor contract has been approved by the Commission. Thus, the proposed extension would only last for a finite and relatively short period of time. In conclusion, for the reasons discussed above, and in consideration of the customer's business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive product list for fifteen additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

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